

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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**DAVID BOUCHER,**

**Plaintiff,**

**v.**

**JEVIC TRANSPORTATION, INC.**

**Defendant.**

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**CASE No. 05-cv-40111-FDS**

**DEFENDANT, JEVIC TRANSPORTATION, INC.'S  
MOTION FOR *PRO HAC VICE* ADMISSION**

NOW COMES defendant Jevic Transportation Inc. and by and through its counsel hereby moves this Honorable Court to grant admission *pro hac vice* to Jeremiah J. Morgan, of the law firm Bryan Cave LLP in Kansas City, Missouri. In support of this motion, plaintiff states as follows:

The undersigned is an attorney of law of the Commonwealth of Massachusetts and is familiar with the facts set forth herein.

Attorney Morgan is an Associate of Bryan Cave LLP in Kansas City, Missouri.

Attorney Morgan is a member in good standing and is admitted to practice before the bar of the State of Missouri. He has likewise been admitted to practice before the United States Court of Appeals for the Eighth and Tenth Circuits, and the United States District Courts for the Western District of Missouri and District of Kansas.

Attorney Morgan has not been censured, suspended, disciplined or disbarred by any court and there is no disciplinary action, contempt, or other proceeding pending

against him before any court. Further, Attorney Morgan is familiar with the Local Rules of the United States District Court of the District of Massachusetts.

The above-referenced attorney is knowledgeable about the incidents giving rise to the claims in this action and has extensive experience in lawsuits of this nature.

WHEREFORE, the plaintiff, Jevic Transportation, Inc. respectfully requests that the Motion for *Pro Hac Vice* Admission of Jeremiah J. Morgan, Esquire be **GRANTED**.

Respectfully Submitted,

**Morrison Mahoney LLP**

/s/ Gary W. Harvey

By: \_\_\_\_\_

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ATTORNEYS FOR DEFENDANT JEVIC  
TRANSPORTATION, INC.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing was served via United States mail, first class postage prepaid on this 19th day of July, 2005, addressed to the following counsel of record:

Raymond A. Desautels III, Esq.  
466 Main Street, P.O. Box 289  
Oxford, MA 01540

Attorney for Plaintiff

/s/ Gary W. Harvey

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Attorney for Defendant